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24 *Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

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28 **UNITED STATES DISTRICT COURT**
29
30 **NORTHERN DISTRICT OF CALIFORNIA**

31 IN RE TEZOS SECURITIES LITIGATION

32 Master File No. 17-cv-06779-RS

33 This document relates to:

34 **CLASS ACTION**

35 ALL ACTIONS.

36 **DECLARATION OF HUNG G. TA IN
37 SUPPORT OF PLAINTIFFS'
38 ADMINISTRATIVE MOTION TO FILE
39 UNDER SEAL**

40 Judge: Hon. Richard Seeborg

1 I, HUNG G. TA, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), counsel for
3 named plaintiffs Pumaro LLC and Artiom Frunze (“Plaintiffs”). I am an active member in good
4 standing of the bar of the State of New York and have been admitted *pro hac vice* in this matter. I
5 submit this declaration in support of Plaintiffs’ Administrative Motion to File their Motion for Class
6 Certification Under Seal (“Administrative Motion”).

7 2. Counsel for Plaintiffs and the Class, and counsel for Defendants Tezos Stiftung,
8 Dynamic Ledger Solutions, Inc. (“DLS”), Kathleen Breitman and Arthur Breitman, entered into a
9 Stipulated Protective Order, so ordered by this Court on October 22, 2018 (Dkt. No. 178) (“Protective
10 Order”).

11 3. DLS produced documents in this action, designating certain documents as
12 “Confidential” pursuant to the Protective Order.

13 4. As part of Plaintiffs’ Motion for Class Certification, Plaintiffs are relying on certain
14 documents produced by DLS and designated as “Confidential.” These documents are Exhibits J, M,
15 O, R and W to the Declaration of Hung G. Ta in Support of Plaintiffs’ Motion for Class Certification,
16 dated January 9, 2019 (collectively, the “Exhibits”). Plaintiffs also refer to and quote from the
17 Exhibits in Plaintiffs’ Memorandum of Law in Support of their Motion for Class Certification (the
18 “Motion”).

19 5. Accordingly, pursuant to the Protective Order, Plaintiffs seek to file under seal the
20 Exhibits and the redacted portions of the Motion.

21 6. By making this Administrative Motion, Plaintiffs do not necessarily agree to the
22 “Confidential” designation of DLS’ documents or to the filing of these documents under seal.

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24 I declare under penalty of perjury that the foregoing is true and correct, this 9th day of January,
25 2019.

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/s/ Hung G. Ta

Hung G. Ta

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